

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
TEXARKANA DIVISION**

<b>UNITED STATES, <i>ex rel.</i></b>	<b>§</b>	
<b>ELIZABETH ANN WRIGHT AND</b>	<b>§</b>	
<b>BRADLEY SLOAN WRIGHT, as</b>	<b>§</b>	
<b>Independent Co-Executors of the Estate</b>	<b>§</b>	
<b>Of Harrold E. (Gene) Wright, Deceased</b>	<b>§</b>	
<b>Plaintiffs,</b>	<b>§</b>	
	<b>§</b>	
<b>vs.</b>	<b>§</b>	<b>CIVIL ACTION No: 5:03cv264</b>
	<b>§</b>	
<b>CHEVRON USA INC., et al.</b>	<b>§</b>	<b>JUDGE DAVID FOLSOM</b>
<b>Defendants.</b>	<b>§</b>	

**UNOPPOSED MOTION TO APPROVE STIPULATION FOR AGREED  
DISTRIBUTION FROM STATUTORY FEES ACCOUNT AND FOR ORDER  
AUTHORIZING THE FINANCE CLERK TO DISTRIBUTE THE MOBIL  
SETTLEMENT FUNDS FROM THE STATUTORY FEES ACCOUNT**

Relators hereby file this Unopposed Motion to Approve Stipulation for Agreed Distribution From Statutory Fees Account and for Order Authorizing the Finance Clerk to Distribute the Mobil Settlement Funds From the Statutory Fees Account and state the following:

1. By Order dated June 26, 2009 (Dkt. No. 1624), the Court authorized the Finance Clerk for the United States District Court for the Eastern District of Texas to establish two accounts in the Court's registry in connection with this litigation. The accounts were established so that settlement funds could be deposited in the accounts by the United States of America and by one or more of the settling defendants. The first account is known as the Relator's Shares Account. The second account is known as the Statutory Fees Account.

2. Attached hereto as Exhibit 1 is a Stipulation for Agreed Distribution From Statutory Fees Account ("Stipulation"). The Stipulation has been signed by those parties to a

Confidential Agreement Regarding Funds in the Registry of the Court who have or who claim to have an interest in the funds deposited in the Statutory Fees Account.

3. Pursuant to the Stipulation, Relators hereby move the Court to Approve the Stipulation and further move the Court to enter an Order Authorizing the Finance Clerk to Distribute the Mobil Settlement Funds from the Statutory Fees account in accordance with Schedule A of the Stipulation.

4. Relators request that the Court enter an Order authorizing the Clerk to pay directly to each Party listed in Schedule A of the Stipulation the amount allocated to such Party in said Schedule A of the Stipulation.

5. All signatories to the Stipulation have been contacted regarding this filing, and none of the signatories oppose the filing of this Motion. Max Roesch, Tom Sedar, and Fred Ragsdale, parties to the Confidential Agreement Regarding Funds in the Registry of the Court, did not sign the Stipulation but do not oppose the Stipulation and consent to the distribution as reflected in Schedule A of the Stipulation.

6. Counsel for the defendants and Counsel for the United States of America do not oppose this motion.

WHEREFORE, Relators pray that the Court Approve the Stipulation and enter an Order Authorizing the Finance Clerk to Distribute the Mobil Settlement Funds from the Statutory Fees account in accordance with Schedule A attached to the Stipulation.

Respectfully submitted,



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**ATTORNEYS FOR RELATORS**

**CERTIFICATE OF SERVICE**

The below signed hereby certifies that on the 13<sup>th</sup> day of May, 2010 the foregoing was electronically served on all counsel of record via email and also those who have elected to be served through the Court's electronic notification system.



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Attorney for Relators